

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JEFF HULBERT, et al.,

Plaintiffs

vs.

Civil Action No.

SGT. BRIAN T. POPE, et al.,

1:18-CV-02317 GLR

Defendants

_____ /

The deposition of LAKESHIA URICA WESBY was held on Monday, October 21, 2019, commencing at 10:21 a.m., at the Law Offices of Hansel Law P.C., 2514 North Charles Street, Baltimore, Maryland 21218, before R. Dwayne Harrison, a Notary Public.

Exhibit A

REPORTED BY: R. Dwayne Harrison

1 **A Yes.**

2 Q So just to be clear, there are certainly
3 occasions in your experience where the staff of elected
4 or appointed officials calls to say to you that there
5 are people on or near Lawyers Mall that the elected or
6 appointed official would not like to interact with and
7 they want help avoiding that interaction and then you
8 pass that on; is that right?

9 MR. FREDRICKSON: Objection.

10 MR. MCFARLAND: Objection.

11 Q I'm sorry. Is that right?

12 **A Yes.**

13 Q Okay. And are those calls -- just now
14 talking about during session, most of those are during
15 session, I'm guessing?

16 Are those -- how often are they, once a
17 day, once a week? What would you estimate?

18 **A I can't really answer because they would be**
19 **random.**

20 Q Yeah, sure.

21 **A I don't -- I can't say once a week or...**

1 **A Yes.**

2 Q Okay. And those calls from the governor's
3 mansion, who are they on behalf of? Governor's
4 mansion -- the governor is writing the name, so I don't
5 know, but who are they on behalf of?

6 MR. FREDRICKSON: Objection. Go ahead.

7 **A They're usually from -- they're usually on**
8 **behalf of his staff or it could be the mansion, the**
9 **governor's mansion.**

10 Q But when they call -- and we're now talking
11 about this group of calls where elected or appointed
12 officials call because they don't want to have to
13 interact with people on or near Lawyers Mall, when you
14 receive those calls from the governor's mansion, are
15 those about the governor or lieutenant governor or both
16 or other elected or appointed officials?

17 MR. FREDRICKSON: Objection.

18 MR. MCFARLAND: Objection.

19 **A It could be both.**

20 Q Okay. And certainly during your career
21 you've gotten those calls about both; is that right?

1 **A Yes.**

2 Q All right. I think you told me about twice
3 a month; is that right?

4 **A Yes.**

5 Q All right. So then when those calls come
6 in, once you ascertain that's the nature of the call,
7 you forward it to the sergeant; am I right?

8 **A Yes.**

9 Q And you've told me you never got a call
10 like that from the public. It's always by or on behalf
11 elected or appointed officials?

12 **A Yes.**

13 Q And when those calls come in and you
14 forward them then to the sergeant, but do you have any
15 more to do with them after that?

16 **A No. Usually the sergeant can come up and**
17 **he may say send whoever, whoever our mobile unit is.**

18 Q And then is it your responsibility to
19 communicate with the mobile unit or does the sergeant
20 do that directly or does it sometimes happen that it's
21 both?

1 Q Now, the --okay. When these types of calls
2 come in, you said you then interact with the sergeant
3 in the way you've described and I'll just adopt that,
4 and then sometimes it's you and sometimes it's the
5 sergeant who communicates direction to other officers.

6 Do I have that correct?

7 A Yes.

8 Q And when it is you, I'm guessing, based on
9 a lot of years of experience, that you just communicate
10 whatever the sergeant tells you to do; is that fair?

11 A Yes.

12 Q So the sergeant might say to you, for
13 instance, you know, have somebody go move those people
14 to another area and you just communicate that to the
15 officer in the field; is that right?

16 A Yes.

17 Q Okay. And that kind of direction certainly
18 you've received before, right?

19 A Yes.

20 Q All right. And you've received that after
21 one of these types of calls we're talking about

1 to me by other folks who thought -- and they may or may
2 not be right, but they thought -- I'll tell you what
3 they thought and then I'm going to ask you if you agree
4 if I'm right, if my understanding is correct.

5 Other folks I have talked to have said to
6 me that they thought governor's mansion meant somebody
7 who works for the Maryland State Police who is likely
8 in or involved in some way with executive protection
9 call from the governor's mansion.

10 Is that your understanding?

11 **A That's true.**

12 Q All right. And as the person who -- I
13 think as you've described it, you're kind of on the
14 front lines of receiving these calls 40 hours a week,
15 right?

16 **A Yes.**

17 Q And so when a person called, you knew it
18 was somebody who worked for the Maryland State Police
19 in executive protection; is that right?

20 **A Yes.**

21 Q And I'm guessing that you get to know those

1 just a second.

2 [Recording was played off the record.]

3 BY MR. HANSEL:

4 Q Ma'am, we're back on the record.

5 When I was off, I played for you twice the
6 recording of the phone call. I'm going to play it
7 third time now on the record and I think you told me
8 you had a fair chance to hear it the two times and were
9 comfortable to answer questions, but I'm going to play
10 it once more just to make certain.

11 Is that all fair and accurate?

12 A Okay.

13 [Recording played once again.]

14 Q Did you hear it there? We just played it
15 on the record.

16 A Yes.

17 Q All right. Good.

18 Now, earlier we talked about these calls
19 that you occasionally get from or on behalf of elected
20 officials with requests to -- because they don't want
21 to interact with people on or near Lawyers Mall to move

1 them or otherwise facilitate the appointed or elected
2 official not interacting with the people.

3 MR. FREDRICKSON: Object to the form of the
4 question.

5 Q We talked about that earlier, right?

6 A **Uh-huh.**

7 Q Is that a yes?

8 A **Yes.**

9 Q Okay, great. You're doing good.

10 When you got this call, is that how you
11 interpreted this call, in that category?

12 MR. FREDRICKSON: Objection.

13 A **Yes.**

14 Q And there are -- because you get -- and
15 this is the type of call that you got before or -- that
16 you'd gotten before, is that fair, with some frequency?

17 A **Yes.**

18 Q And do you recall how many times a call
19 like this has come in by or on behalf of the lieutenant
20 governor?

21 Was he more often than other elected

1 officials, less often or about the same?

2 **A That's very rare.**

3 Q Okay. All right. Now, the -- but it
4 certainly has happened before.

5 When you say it's very rare, it's happened
6 before?

7 **A Yeah, it's happened before, but I can't**
8 **recall.**

9 Q In other words, over 19 years, you can't
10 sit here and tell me every time somebody by or on
11 behalf of the lieutenant governor has called and asked
12 you to move people from Lawyers Mall that he doesn't
13 want to interact with, but it's happened other times?

14 **A It has happened -- it has happened before.**

15 Q Okay. All right. Fair enough. I
16 understand.

17 Now -- and obviously -- you say it's
18 happened before. Obviously, that's what this call was
19 about too?

20 **A Yes.**

21 Q And you understood when you got the call;

1 is that right?

2 **A Yes.**

3 Q Okay. And I ask you that because the call
4 is brief and somebody who didn't have your training and
5 experience to understand the call after 19 years of
6 having heard these calls, might have other
7 interpretations of it. But you've told me this was one
8 of the type of calls we're talking about, right?

9 **A Yes.**

10 MR. FREDRICKSON: Objection.

11 Q And you have developed -- you know how to
12 recognize it based on how you've interacted with these
13 people in the governor's mansion over a long period of
14 time, is that --

15 MR. FREDRICKSON: Object to the form.

16 MR. MCFARLAND: Objection.

17 BY MR. HANSEL:

18 Q Is that right?

19 **A Yeah.**

20 Q Now, when this call came in, I think you
21 told me your usual approach would be to forward it to a